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BY ECF AND HAND DELIVERY

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October 21, 2014

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Honorable Shira A. Scheindlin  
District Court Judge  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *In re Vivendi Universal, S.A., Securities Litigation*, No. 02-cv-05571 (S.D.N.Y.) (SAS)

Dear Judge Scheindlin:

We are writing in response to Abbey Spanier's October 20, 2014 letter to advise the Court that Vivendi has no objection to class plaintiffs' revisions to its discovery request, subject to its earlier reservation of rights regarding limitations placed on its ability to conduct reliance discovery of class members. In addition, Vivendi has no objection to plaintiffs' proposed timetable for resolving any reliance challenges.

Respectfully submitted,

/s/ James W. Quinn

James W. Quinn

cc: All Counsel of Record (by ECF only)